UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD/FM)

This document relates to:

Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq,

et al., 04-CV-1076 (GBD)

REQUEST FOR ENTRY OF DEFAULT AGAINST IRAN DEFENDANTS

TO THE CLERK OF COURT: Please enter default of defendants ISLAMIC REPUBLIC OF IRAN, IRANIAN MINISTRY OF INTELLIGENCE AND SECURITY, IRANIAN MINISTER OF INTELLIGENCE AND SECURITY ALI FALLAHIAN, IRANIAN REVOLUTIONARY GUARD CORPS, IRANIAN REVOLUTIONARY GUARD CORPS --QODS FORCE, AYATOLLAH ALI HOSEINI-KHAMENEI, AND DEPUTY COMMANDER BRIGADIER GENERAL OF THE IRANIAN REVOLUTIONARY GUARD CORP. MOHAMMED BAQR ZALQADR pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, for failure to plead or otherwise defend the above-captioned action as fully appears from the court file herein and from the accompanying affidavit of Jerry S. Goldman, Esq. Please further issue a Clerk's Certificate of Default in the form attached to the accompanying affidavit of Jerry S. Goldman, Esq.

Dated: July __, 2015

New York, New York

/s/ Jerry S. Goldman Jerry S. Goldman, Esquire ANDERSON KILL P.C. 1251 Avenue of the Americas 42nd Floor New York, NY 10020